



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

Samantha R. D'Aversa
Assistant United States Attorney

401 Market Street
P.O. Box 2098
Camden, NJ 08101
samantha.daversa@usdoj.gov

main: (856) 757-5026
direct: (856) 968-4928
fax: (856) 757-5416

September 18, 2023

Via Electronic Filing

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: Letter Requesting 14-Day Extensions of Time to Answer
Plaintiffs' Complaints
B.Y.C.C., et al. v. United States, No. 22-cv-06586-MAS
J.A.L.C., et al. v. United States, No. 22-cv-06587-MAS
R.J.P., et al. v. United States, No. 22-cv-06588-MAS**

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request an additional 14 days for the United States to answer Plaintiffs' Complaints. The Court previously granted the United States 30-day extensions of time to answer the Complaints. *See* ECF No. 33 (*B.Y.C.C.*); ECF No. 30 (*J.A.L.C.*); ECF No. 32 (*R.J.P.*). The current date by which the United States must file its answer in each of the above-referenced cases is September 28, 2023. If the Court grants the United States' 14-day extension requests, its answers will be due on October 12, 2023. Good cause exists to grant these extensions because this Office needs additional time to confer with the relevant federal agencies and obtain approvals from Department of Justice components before answering.

If this proposal is acceptable to the Court, we respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your consideration of these requests.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Samantha R. D'Aversa
SAMANTHA R. D'AVERSA
Assistant United States Attorney
Attorneys for the United States

cc: All counsel of record
AUSA John F. Basiak Jr.
AUSA Angela Juneau